



Re: EW Pesticide reanalysis results - EPA comments

Ravi Sanga to: Susan McGroddy

12/29/2010 01:31 PM

dan berlin, "Debra Williston (debra.williston@kingcounty.gov)",

Cc: "Debra Williston ((b) (6))", Gary Pascoe, Doug

Hotchkiss, "Jeff Stern (jeff.stern@kingcounty.gov)", Kirsten Payne,

Susie -- See below for comments on the data report describing the Pesticide reanalysis results. The data report must be revised and resubmitted to EPA for approval, addressing comments below. Please call me if you have any questions.

1) Page 5: The variance associated with the original supercomposites for PCB congeners and dioxins/furans must be described quantitatively.

2) Page 5: For the **few** contaminants which were detected, there must be a discussion as to how concentrations will be treated in computing dose. Specifically, UCLs cannot be computed for chemicals with only one data point. A key point is that EPA believes that it is unlikely that pesticides are present at high concentrations in the East Waterway/LDW given historic and current manufacturing practices. Given a lack of evidence for the presence of pesticides and cost considerations, EPA made an exception in allowing the EWG to use individual supercomposites to develop EPCs rather than requiring collection of sufficient samples to develop UCLs. UCLs must, however, be computed where possible (e.g. rockfish and shellfish samples). The variance associated with other analytes may be used to estimate a UCL for organism/tissue type samples having only one result. Such a discussion would need to occur in the uncertainty section of the EW HHRA.

3) Page 20: There must also be some discussion here or reference to, documents that describe expected RLs and whether or not the RLs obtained matched expectations.

4) With regards to the use of the modified EPA method 1699 using a High Resolution Gas Chromatography combined with Tandem Mass Spectrometry (HRGC/MS/MS), EPA found this analytical technique (Modified 1699) to be very effective and highly recommended in determining organochlorine pesticides in complex matrices at SF sites with significant concentrations of PCB Aroclors as the latter usually interferes with the identification and quantitation of pesticide compounds especially DDT and by-products. The isotope-labeled and internal standard techniques provide more specificity, reliable identification and more realistic concentration range while the triple quad tandem MS/MS enhances mass-ion selectivity and instrument sensitivity.

Except for some transcription errors in the raw data which did not affect the quality for the analytical data submitted, EPA did not find any problem with the deliverables submitted by the CAS nor the Data Validation Report conducted by Ecochem. The analytical data as qualified can be used for all purposes in the SRI/FS.

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Susan McGroddy

Here is the addendum to the fish and crab tissue...

10/04/2010 04:30:08 PM

From: Susan McGroddy <SusanM@windwardenv.com>
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Date:

Subject:

10/04/2010 04:30 PM

Pesticide reanalysis results

Here is the addendum to the fish and crab tissue data report with the results for the pesticide reanalysis. I have sent the analytical package and data validation report to Maja for her review. Please let me know if you have any questions or concerns.

Thanks.

Susie

Susan McGroddy PhD

Associate

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[attachment "pesticide addendum 10-4-2010.docx" deleted by Ravi Sanga/R10/USEPA/US]